

November 29, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral Ex Parte Presentation – Securus Technologies, Inc. and Inmate Calling Solutions, LLC d/b/a ICSolutions Consolidated Applications for Consent to the Transfer of Control of Licenses and Authorizations – WC Docket No. 18-193

Dear Ms. Dortch:

On November 27, 2018, representatives of Securus Technologies, Inc. (“Securus”), Inmate Calling Solutions, LLC d/b/a ICSolutions (“ICS,” and together with Securus, “Applicants”), and Keefe Group, LLC (“Keefe”)¹ met with the Federal Communications Commission (“FCC” or “Commission”) Staff listed in Exhibit A from the (1) Wireline Competition Bureau (“WCB”), including Staff from the Office of the Bureau Chief, the Competition Policy Division (“CPD”), and the Pricing Policy Division (“PPD”); (2) International Bureau (“IB”); (3) Office of Strategic Planning and Policy Analysis (“OSP”); and (4) Office of General Counsel (“OGC”) to discuss the status of the above-referenced application.²

The Applicants initially provided a summary of the issues raised in opposition to the transaction and stated their position that these issues had been fully addressed in the record developed to date. Thereafter, at the request of the Staff, the Applicants provided a general overview of the bidding process for inmate telephone service (“ITS”) contracts. Largely in response to questions posed by the Staff, the Applicants discussed, among other things, general bidding requirements in Requests For Proposals (“RFP”) (including basic service components sought therein), the duration of RFP processes, other services offered in conjunction with ITS, such as inmate tablets and contraband cellphone detection, and trends in ITS rates.

The Applicants then also responded to Staff questions concerning certain information submitted by the Applicants in response to Specification 19 in the Commission’s September 11,

¹ The representatives were: Robert Pickens, Chief Executive Officer and President of Securus, Dennis Reinhold, Senior Vice President and General Counsel of Securus, Paul Besozzi and Peter Bean of Squire Patton Boggs (US), LLP, outside regulatory counsel for Securus, Harry Robins of Morgan, Lewis & Bockius LLP, outside antitrust counsel for Securus, Nathan Schulte, President of Keefe, Tim McAteer, President and General Manager of ICS, Howard Liberman and Jennifer Kostyu of Wilkinson Barker Knauer, LLP, outside regulatory counsel for ICS, and Nicholas Gaglio of Axinn, Veltrop & Harkrider LLP, outside antitrust counsel for ICS.

² One FCC participant, Gregory Kwan, CPD, WCB, participated telephonically.

Ms. Marlene H. Dortch

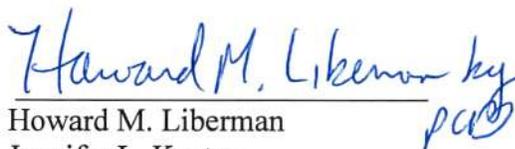
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2018 Information and Document Requests,³ agreeing to supply further clarifying information in response to the Staff's further inquiries as necessary. More specifically, and at the request of the Staff, Securus and ICS confirmed that updates to the Specification 19 data have included only new information since any prior updates and did not change previously submitted data. Representatives for Securus further clarified that in its updates the company has highlighted any new information.

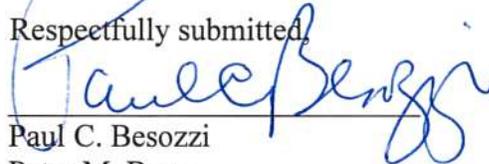
Finally, there was a brief discussion of the status of state approvals for the transaction, potential timing of FCC action, including restarting the Commission's informal 180-day shot clock, and the Public Notice released that day concerning Protocall, LLC and Combined Public Communications, LLC.⁴

This notice is being filed pursuant to Section 1.1206(b) of the Commission's rules.⁵

 Howard M. Liberman by *PCB*

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Respectfully submitted,



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cc: FCC participants listed in Exhibit A

³ Letter from Lisa Hone, Deputy Chief, WCB, to Paul C. Besozzi and Peter M. Bean, Squire Patton Boggs (US) LLP, Counsel for Securus Technologies, Inc., and Howard M. Liberman and Jennifer L. Kostyu, Wilkinson Barker Knauer, LLP, Counsel for TKC Holdings, Inc. and Inmate Calling Solutions, LLC d/b/a ICSolutions, WC Docket No. 18-193, DA 18-939 (dated Sept. 11, 2018 ("Information Requests").

⁴ *Domestic Section 214 Application Filed for the Acquisition of Certain Assets of Protocall, LLC by Combined Public Communications, LLC*, Public Notice, WC Docket No. 18-309, DA 18-1202 (Nov. 27, 2018).

⁵ 47 C.F.R. § 1.1206(b).

Exhibit A

FCC Participants

Lisa Hone, WCB, Office of the Bureau Chief
Eric Ralph, WCB, Office of the Bureau Chief
Daniel Kahn, WCB, CPD
Terri Natoli, WCB, CPD
Jodie May, WCB, CPD
Dennis Johnson, WCB, CPD
Michael Ray, WCB, CPD
Gregory Kwan, WCB, CPD
Jesse Goodwin, WCB, CPD
Pamela Arluk, WCB, CPD
Joseph Price, WCB, PPD
Tavi Carare, WCB, PPD
Douglas Galbi, WCB, PPD
Paula Cech, WCB, PPD
David Krech, IB
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Bill Dever, Transaction Team, OGC
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Amy Nathan, OSP